



Christopher P. Massaro
ASSOCIATE

Reply to New Jersey Office
WRITER'S DIRECT LINE: 201-525-6272
WRITER'S DIRECT FAX: 201-678-6272
WRITER'S E-MAIL: CMassaro@coleschotz.com

COURT PLAZA NORTH
25 MAIN STREET
P.O. Box 900
HACKENSACK, NJ 07602-0900
201.489.3000 201.489.1536 FAX

NEW YORK

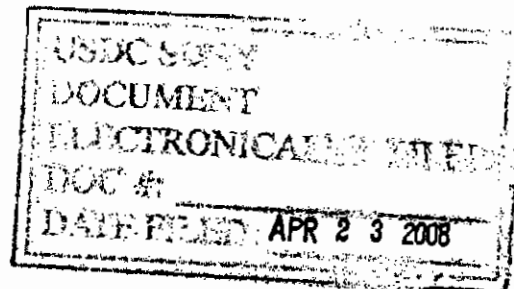
DELAWARE

MARYLAND

April 23, 2008

VIA FACSIMILE (212) 805 - 0426

Honorable Laura Taylor Swain
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
Room 755
500 Pearl Street
New York, NY 10007-1312



MEMO ENDORSED

Re: **Educational Credit Management Corporation
v. Nu-Valet Cleaners
Civil Action No.: 07-9531 (LTS)**

Dear Judge Swain:

This firm represents Plaintiff Educational Credit Management Corporation ("ECMC") with regard to the above-referenced matter.

Defendant Nu-Valet Cleaners ("Nu-Valet") has failed to answer or otherwise respond to ECMC's complaint. Accordingly, ECMC intends to file a motion for default judgment.

However, as we advised the Court in our letter dated January 28, 2008, calculating the amount of the default judgment is somewhat complicated. The Complaint alleges that Nu-Valet violated 20 U.S.C. § 1095(a) by failing to garnish a percentage of the wages of one of its employees, so that those funds could be applied to the employee's outstanding student loan debt. In order to determine the sum that Nu-Valet should have garnished and calculate the amount of the default judgment, ECMC needs to obtain the employee's salary information. We have unsuccessfully attempted to obtain that information from Nu-Valet and the employee.

I am now in the process of serving subpoenas on both Nu-Valet's principal owner and its former accountant in order to obtain the requisite salary information from one of those sources.

WWW.COLESCHOTZ.COM

40475/0124-1518339v1

COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.
ATTORNEYS AT LAW

Honorable Laura Taylor Swain
April 23, 2008
Page 2

Accordingly, pursuant to my recent conversation with Your Honor's Law Clerk, ECMC respectfully requests the Court to adjourn the pre-trial conference, currently scheduled for May 2, 2008, for a period of 60 days so that ECMC will have an opportunity to acquire the necessary salary information and prepare its motion for default judgment.


The Court's time and attention to this matter are greatly appreciated. I will await the Court's instructions.

Respectfully submitted,
s/ Christopher P. Massaro
Christopher P. Massaro

CPM:rlg

*The confrena is adjourned
to June 30, 2008, at 4:30pm.*

SO ORDERED.

 4/22/08
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE